

Exhibit R



Planet Depos®
We Make It Happen™

Transcript of Alireza Raissinia

Date: February 14, 2025

Case: Headwater Research LLC -v- Verizon/T-Mobile/AT&T/Samsung

Planet Depos

Phone: 888.433.3767 | Email: transcripts@planetdepos.com

www.planetdepos.com

Michigan #8598 | Nevada #089F | New Mexico #566

Transcript of Alireza Raissinia
Conducted on February 14, 2025

1 (1 to 4)

1	IN THE UNITED STATES DISTRICT COURT	1	Video Deposition of ALIREZA RAISSINIA,
2	FOR THE EASTERN DISTRICT OF TEXAS	2	conducted virtually,
3	MARSHALL DIVISION	3	
4	-----x	4	
5	HEADWATER RESEARCH LLC, :	5	
6	Plaintiff, :	6	
7	v. : Case No.:	7	
8	T-MOBILE USA, INC. and : 2:23-cv-00379-JRG-RSP	8	Pursuant to notice, before Judith E.
9	SPRINT CORP., : (Lead Case)	9	Bellinger, Registered Professional Reporter,
10	Defendants. :	10	Certified Realtime Reporter, and E-Notary Public
11	-----x	11	in and for the State of Maryland.
12	HEADWATER RESEARCH LLC, :	12	
13	Plaintiff, :	13	
14	v. : Case No.:	14	
15	T-MOBILE USA, INC. and : 2:23-cv-00377-JRG-RSP	15	
16	SPRINT CORP., : (Member Case)	16	
17	Defendants. :	17	
18	-----x	18	
19	(Caption continued on next page)	19	
20		20	
21	Video Deposition of ALIREZA RAISSINIA	21	
22	Conducted Virtually	22	
23	Friday, February 14, 2025	23	
24		24	
25		25	
2	(Caption continued from previous page)	2	
1	Job No.: 571075 12:36 p.m. EST	1	A P P E A R A N C E S
2	Pages: 1 - 183	2	
3	Stenographically reported by: Judith E. Bellinger, RPR, CRR, CSR-TX, CCR-WA, CCR-NM	3	ON BEHALF OF THE PLAINTIFF:
4	-----x	4	REZA MIRZAIE, ESQUIRE
5	HEADWATER RESEARCH LLC, :	5	KRISTOPHER R. DAVIS, ESQUIRE
6	Plaintiff, :	6	RUSS AUGUST & KABAT
7	v. : Case No.:	7	12424 WILSHIRE BOULEVARD
8	VERIZON COMMUNICATIONS : 2:23-CV-00352-JRG-RSP	8	Los Angeles, CA 90025
9	INC.; CELLCO PARTNERSHIP :	9	310.826.7474
10	d/b/a VERIZON WIRELESS; :	10	
11	VERIZON CORPORATE SERVICES:	11	ON BEHALF OF DEFENDANTS VERIZON AND T-MOBILE:
12	GROUP INC., :	12	ANDREW ROBB, ESQUIRE
13	Defendants. :	13	GIBSON, DUNN & CRUTCHER LLP
14	-----x	14	310 University Avenue
15	HEADWATER RESEARCH LLC, :	15	Palo Alto, CA 94301-1744
16	Plaintiff, :	16	650.849.5334
17	v. : Case No.:	17	
18	AT&T SERVICES, INC., AT&T : 2:23-cv-00397-JRG-RSP	18	ON BEHALF OF THE DEFENDANT AT&T:
19	MOBILITY, LLC AND AT&T : LEAD CASE	19	KEVIN P. HESS, ESQUIRE
20	Defendants. :	20	MCKOOL SMITH
21	-----x	21	303 Colorado Street
22	HEADWATER RESEARCH LLC, :	22	Suite 2100
23	Plaintiff, :	23	Austin, TX 78701
24	v. : Case No.:	24	512.692.8749
25	SAMSUNG ELECTRONICS CO., : 2:23-cv-641-JRG-RSP	25	
	LTD., et al., :		
	Defendants. :		
	-----x		

Transcript of Alireza Raissinia
Conducted on February 14, 2025

2 (5 to 8)

1 A P P E A R A N C E S C O N T I N U E D

2 ON BEHALF OF THE SAMSUNG DEFENDANTS IN THE

4 641 CASE:

5 JARED HARTZMAN, ESQUIRE

6 FISH & RICHARDSON P.C.

7 1000 Maine Avenue, SW

8 Suite 1000

9 Washington, DC 20024

10 202.783.5070

11 - AND -

12 TAE HONG, ESQUIRE

13 FISH & RICHARDSON

14 1180 Peachtree Street, NE

15 21st Floor

16 Atlanta, GA 30309

17 404.724.2759

18

19 ON BEHALF OF THE DEONENT:

20 DONN WASLIF, ESQUIRE

21 MORGAN FRANICH FREDKIN SIAMAS & KAYS LLP

22 333 WEST SAN CARLOS STREET

23 Suite 1050

24 San Jose, CA 95110

25 408.288.8288

5

1 C O N T E N T S

2 EXAMINATION OF ALIREZA RAISSINIA PAGE

3 By Mr. Robb 10

4 By Mr. Hess 106

5 By Mr. Robb 120

6 By Mr. Hartzman 127

7 By Mr. Mirzaie 163

8 E X H I B I T S

9 (Attached to the transcript)

10 Exhibits: PAGE

11 Exhibit 1 LinkedIn profile of Ali Raissinia 18

12 Exhibit 2 T-Mobile my Touch 3G Slide User 48

13 guide, Bates Numbers TMO_H200043878

14 - 4059

15 Exhibit 3 "Apple iOS 7:app developers explain 56

16 its key features and implications"

17 Exhibit 4 United States Patent Number 87

18 9,215,613 B2

19 Exhibit 5 United States Patent Number 95

20 8,589,541 B2

21 Exhibit 6 United States Patent Number 136

22 9,179,359 B2

25

1 A P P E A R A N C E S C O N T I N U E D

2

3 ALSO PRESENT:

4 Philip Astor, Videographer

5 Harut Akopyan, Planet Depos Technician

6

1 P R O C E E D I N G S

2

3 THE VIDEOGRAPHER: Here begins Media

4 Number 1 in the videotaped deposition of

5 Alireza Raissinia, in the matter of

6 Headwater Research, LLC v. Verizon/T-Mobile/AT&T,

7 and Headwater Research, LLC v. Samsung Electronics

8 Co, Limited, et al., in the United States District

9 Court for the Eastern District of Texas, Marshall

10 Division, Case Numbers 2:23-CV-00352, 379, 392

11 [sic], and 641 JRG-RSP.

12 Today's date is February 14th, 2025.

13 The time on the video monitor is 12:36.

14 The remote videographer today is Philip

15 Astor, representing Planet Depos.

16 All parties of this video deposition

17 are attending remotely.

18 Would counsel, please, voice-identify

19 themselves and state whom they represent.

20 MR. ROBB: Andrew Robb, Gibson Dunn,

21 for Verizon and T-Mobile.

22 MR. HESS: Kevin Hess, McKool Smith,

23 for AT&T.

24 For the record, I didn't hear the

25 397 case in the read-on, and that's the AT&T case,

7

8

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

Transcript of Alireza Raissinia
Conducted on February 14, 2025

3 (9 to 12)

	9	
1	Philip.	11
2	MR. HARTZMAN: Jared Hartzman for Fish	
3	& Richardson for the Samsung defendants in the	
4	641 case.	
5	With me on the Zoom is my colleague	
6	Tae Hong.	
7	MR. WASLIF: Donn Waslif, representing	
8	the witness, Alireza Raissinia.	
9	MR. MIRZAI: Reza Mirzaie, plaintiff	
10	Headwater. With me on the line is my partner	
11	Kris Davis.	
12	THE VIDEOGRAPHER: The court reporter	
13	today is Judy Bellinger, representing Planet	
14	Depos.	
15	The witness will now be sworn.	
16	ALIREZA RAISSINIA,	
17	being first duly sworn, was examined	
18	and testified as follows:	
19	MR. ROBB: Before I begin, I'll also	
20	note for the record that I believe that in the	
21	read-on, the 379 case for T-Mobile was mentioned	
22	but the 377 case was not, so I'll just note it's	
23	for both of those related cases.	
24	EXAMINATION BY COUNSEL FOR THE DEFENDANTS VERIZON	
25	AND T-MOBILE	
	10	
1	BY MR. ROBB:	12
2	Q Good morning, Mr. Raissinia.	
3	A Good morning.	
4	Q Could you, please, state your full name	
5	for the record?	
6	A Yeah. Alireza Raissinia, my full name.	
7	Q And you understand you're under oath	
8	today?	
9	A Correct, I do.	
10	Q And you understand you have an	
11	obligation to provide truthful and accurate	
12	testimony today?	
13	A I do.	
14	Q If you find a question is unclear,	
15	please, let me know and I will attempt to clarify	
16	it. Otherwise, I will assume you understand the	
17	question.	
18	Is that fair?	
19	A That is fair.	
20	Q You can request breaks as needed. But	
21	I ask that you not request a break when a question	
22	is pending.	
23	Is that fair?	
24	A Correct. That's fair.	
25	Q Please wait until I finish my question	

	13		15
1	A I don't recall. I might have.	1	A I mentioned it to my wife.
2	Q Have you ever given -- have you ever	2	Q Is there anyone else you spoke to about
3	testified in court before?	3	your deposition?
4	A No. Not in court.	4	A No.
5	Q Have you ever given sworn written	5	Q Since the Samsung -- let me back up.
6	testimony before, for example, in the form of a	6	When was the Samsung deposition?
7	declaration or affidavit?	7	A I recollect it was about a year and a
8	A No.	8	few months back.
9	Q And other than the Samsung deposition	9	Q Since the Samsung deposition, have you
10	10 last year, you don't remember, one way or the	10	10 spoken with anyone about any issues relating to
11	11 other, of whether you've ever been deposed before;	11	11 Headwater?
12	12 is that correct?	12	12 MR. WASLIF: With the exception of the
13	A That's correct. I don't.	13	13 attorney-client communications you've had, he's
14	Q What do you know about this litigation,	14	14 already covered.
15	15 specific litigation against -- brought by	15	Q Let me ask a more precise question.
16	16 Headwater against Verizon and T-Mobile?	16	Setting aside the conversations you had
17	17 MR. WASLIF: Vague, overbroad.	17	17 in preparation for your deposition today, with
18	18 Can you narrow the question, Counsel?	18	18 your two attorneys, have you had any conversations
19	19 MR. ROBB: Counsel, as you know, in	19	19 with anyone, for any reason, about Headwater since
20	20 this district, you have to restrict the questions	20	20 the Samsung deposition?
21	21 [sic] to form.	21	A If the conversation means talking to
22	22 MR. WASLIF: Object to form.	22	someone, no.
23	23 Overbroad. And it also calls for privileged	23	Q Okay. Did you have written
24	24 communication because you didn't eliminate that.	24	24 conversations with anyone?
25	25 So I don't know what you mean by the	25	A I had one text exchange with Greg
	14		16
1	1 litigation. It's pretty broad.	1	1 Raleigh.
2	2 MR. ROBB: Counsel, you have to limit	2	2 Q Were there any other written
3	3 your objections to form in this district.	3	3 communications with anyone --
4	4 MR. WASLIF: And you're not to include	4	4 A No.
5	5 in your answer anything that we discussed. That's	5	5 Q Let me finish the question.
6	6 attorney-client privilege, Mr. Raissinia.	6	6 Were there any other written
7	7 Q With counsel's instruction, what do you	7	7 communications you had with anyone following the
8	8 know about the lawsuit that Headwater has brought	8	8 Samsung deposition?
9	9 against Verizon and T-Mobile?	9	9 A No.
10	10 MR. WASLIF: Same objection.	10	10 Q What did you discuss with Dr. Raleigh
11	11 A Nothing.	11	11 in that written communication you referred to?
12	12 Q Nothing. Okay.	12	12 A He asked me a question, specifically,
13	13 What did you do to prepare for your	13	13 whether I have received my Ph.D. degree, and I
14	14 deposition today?	14	14 told him, no, I got my -- I worked on -- I did my
15	15 A I did nothing. I only talked to Donn	15	15 coursework but I didn't get the degree. That's
16	16 and David. For about ten minutes with Donn, half	16	16 it.
17	17 an hour with David.	17	17 Q Was there any other subject matter
18	18 Q And are Donn and David your attorneys?	18	18 discussed in your conversation with Dr. Raleigh
19	19 A Correct.	19	19 that you're referring to?
20	20 Q Did you review any documents in	20	20 A No.
21	21 preparation for your deposition today?	21	21 Q Did you bring any documents with you
22	22 A No.	22	22 today?
23	23 Q Other than meeting with your attorneys,	23	23 A No.
24	24 Donn and David, did you talk with anyone else	24	24 Q Where are you currently?
25	25 about your deposition that was happening today?	25	25 A I'm in Bay Area. I live in Bay Area.

Transcript of Alireza Raissinia
Conducted on February 14, 2025

5 (17 to 20)

	17	19
1 Q And are you physically in your house 2 right now? Where are you?	1 Q Is what I've uploaded as Exhibit 1 a 2 true and correct copy of your LinkedIn profile?	
3 A No, no. I'm in my office. 4 Q In your home office?	3 A Okay. Yeah. Yes, it is. 4 Q Okay. Thank you.	
5 A Work office. Work office. At 6 Qualcomm. 7 Q So you're at Qualcomm right now? 8 A Correct. 9 Q And is your counsel in the building 10 with you?	5 Does your LinkedIn profile accurately 6 capture your work history? 7 A Yeah, pretty much. Yeah. 8 Q Are there any inaccuracies in your 9 LinkedIn profile?	
11 A No. 12 MR. WASLIF: No. 13 Q I would ask that while we're on the 14 record, that you refrain from having any 15 communications with anyone, including your 16 counsel, unless it's actually via this Zoom, i.e., 17 for example, please don't email your counsel while 18 we're on the record. 19 Can you agree with that?	10 A Not really. I think -- I haven't 11 looked at it for a long time, but I -- Qualcomm, 12 Headwater, Headwater. 13 MR. WASLIF: Read it to yourself. 14 Because the court reporter's going to take down 15 everything. 16 A Yes, it's a pretty good representative. 17 Correct. It's correct.	
20 A Sure. 21 Q Mr. Raissinia, I have uploaded -- 22 actually, sorry. Strike that. 23 I'm going to upload it properly marked. 24 You can ignore the PDF I just uploaded. 25 MR. WASLIF: Andrew, I couldn't hear	18 Q So you were at Qualcomm from 2006 until 19 2009; is that right? 20 A Correct. 21 Q And then in 2009, you left Qualcomm to 22 join Headwater and ItsOn, correct? 23 A Yes. 24 Q And you were with both Headwater and 25 ItsOn for, approximately, one year, and in 2010,	
1 you. I'm sorry. 2 MR. ROBB: I uploaded the PDF before I 3 designated it Exhibit 1, so I'm just re-uploading 4 it. 5 PLANET DEPOS TECHNICIAN: Do you want 6 me to open it? 7 MR. ROBB: No. Hold on just one 8 second. 9 PLANET DEPOS TECHNICIAN: Sorry. 10 (Exhibit 1 marked for identification 11 and attached to the transcript.) 12 BY MR. ROBB: 13 Q Mr. Raissinia, I had -- I keep calling 14 you Mr. Raissinia. Is it correct that you 15 still -- you don't have a Ph.D.; is that right? 16 A Right. 17 Q So, Mr. Raissinia, I have uploaded, as 18 a document marked as Exhibit 1, a PDF which I 19 believe is of your LinkedIn profile, retrieved 20 this month. 21 Can you, please, let me know when you 22 open it. 23 A The Exhibit 1, EX1? 24 Q EX1, yes. 25 A Okay.	18 Q you left ItsOn and then only worked at Headwater 19 through 2011, correct? 3 A Yeah. I guess, physically, you could 4 say I left, but I was -- I mainly focused on the 5 Headwater work, as opposed to ItsOn, yes. 6 Q Then 2011, you went back to Qualcomm 7 and left Headwater, right? 8 A Right. 9 Q And you've been at Qualcomm ever since? 10 A Correct. 11 Q Since -- do you recall when, in 2011, 12 you left Headwater? 13 A I think somewhere around -- I joined 14 Qualcomm January, if I remember correctly. Early 15 January. I don't know, January 8, 9, something 16 like that. 17 I probably had left Headwater before 18 Christmas or something like that. 19 Q After leaving Headwater at the end of 20 2011 and joining Qualcomm in the beginning of 21 2012, have you had any substantive interactions or 22 contributions to Headwater? 23 A No. Not at all. 24 Q Are you aware of what ultimately 25 happened to ItsOn?	

	21	23	
1	MR. WASLIF: Objection. Vague.	1	MR. WASLIF: Same objections.
2	A No. I don't quite know what happened.	2	A No.
3	Q Do you have a general understanding	3	Q Do you have any view or information,
4	that ItsOn no longer exists?	4	sitting here today, about whether AT&T infringes
5	A Correct. That understanding is	5	any of Headwater's patents?
6	correct.	6	MR. WASLIF: Same objections.
7	Q Beyond the understanding that ItsOn no	7	A No.
8	longer exists, do you have any understanding of	8	Q Do you have any view or information,
9	the details of what caused ItsOn to shut down or	9	sitting here today, about whether Samsung
10	the process by which ItsOn shut down?	10	infringes any of Headwater's patents?
11	A Not at all.	11	MR. WASLIF: Same objections.
12	Q Have you had any insight into inner	12	A No.
13	works of Headwater since you left the company in	13	Q Sitting here today, do you have any
14	2011?	14	view or information about whether any of the
15	A No.	15	16 products or services offered by Samsung or Apple
16	Q Have you been --	16	17 or Google infringes any of Headwater's patents?
17	MR. WASLIF: Pardon me. One second,	17	MR. WASLIF: Form. Calls for an
18	Andrew.	18	opinion, which he's not here to give.
19	Madam court reporter, are you getting	19	Go ahead.
20	my objections or can you hear me?	20	A No.
21	Q Mr. Raissinia, I would suggest that --	21	Q When did you first meet Dr. Raleigh?
22	your counsel can tell you the same thing, but I'll	22	A 1995. I don't remember exactly the
23	tell you. If you could just wait one second	23	month or what. But somewhere around that time.
24	because you and Mr. Waslif are talking over each	24	Q And did you interact with Dr. Raleigh
25	other.	25	when you were at Qualcomm in the 2006 to 2009
	22	24	
1	MR. WASLIF: Thank you for that,	1	stint?
2	Counsel.	2	A Very little.
3	Q Since leaving Headwater in 2011, have	3	Q While you were at Qualcomm in that 2006
4	you had any involvement, whatsoever, in the	4	to 2009 period, what were your interactions with
5	prosecution of any of Headwater's patents?	5	Dr. Raleigh?
6	A No.	6	MR. WASLIF: Objection. Vague. Form.
7	Q Since leaving Headwater in 2011, have	7	A If any, it was not work related because
8	you had any discussions with any individuals about	8	he was actually in San Diego and I was in Bay Area
9	the prosecution of any of Headwater's patents?	9	and I was focused on stuff that he was not. He
10	A No.	10	was doing something different, apparently.
11	Q Since leaving Headwater in 2011, have	11	Q At a high level, what were the kinds of
12	you had any discussions with anyone relating to	12	things you were working on at Qualcomm from 2006
13	alleged infringement by industry participants of	13	to 2009?
14	any Headwater patents?	14	A I was working on or we were working on?
15	MR. WASLIF: Object to form.	15	I wasn't working with Greg Raleigh on anything. I
16	A No.	16	was working on engineering technology.
17	Q Do you have any view or information,	17	Q I was asking you what you were working
18	sitting here today, about whether Verizon	18	on. So at a high level, what were you working on
19	infringes any of Headwater's patents?	19	19 at Qualcomm from 2006 to 2009?
20	MR. WASLIF: Object to form. Calls for	20	MR. WASLIF: Object to the form.
21	an expert opinion, which he's not here to give.	21	And the question calls for at a high
22	A No. I don't even know.	22	22 level, as opposed to anything that would be
23	Q Do you have any view or information,	23	23 confidential to Qualcomm.
24	sitting here today, about whether T-Mobile	24	A It's more engineering technology.
25	infringes any of Headwater's patents?	25	Q What caused you to leave Qualcomm in

	173	
1	A Yes.	
2	Q Do you remember he asked four or	1
3	five -- he asked that question four or five times	2
4	in a row?	3
5	Do you recall that?	4
6	MR. ROBB: Object to form.	5
7	A Yes.	6
8	Q But if an app can be woken up in the	7
9	background and make API calls, then there's	8
10	certainly something for a policy to apply to and	9
11	block, right?	10
12	MR. ROBB: Object to form.	11
13	A Correct.	12
14	Q And if there is a policy blocking	13
15	network access for the app, that's indicating that	14
16	there's some periods when the app can wake up so	15
17	you want to have the policy in place, fair?	16
18	MR. ROBB: Object to form.	17
19	A Fair.	18
20	Q Now, earlier today, Mr. Robb also asked	19
21	if Headwater developed any real -- strike that.	20
22	Earlier today Mr. Robb asked, four or	21
23	five times, whether Headwater developed any real	22
24	technology or just wrote ideas down on paper.	23
25	Do you recall that?	24
	174	25
1	MR. ROBB: Object to form.	176
2	A I do.	1
3	Q Do you recall him asking that same	2
4	question four or five times in a row, too?	3
5	MR. ROBB: Object to form.	4
6	Argumentative. Form.	5
7	A I do.	6
8	Q You just meant that Headwater did not	7
9	develop product development, correct?	8
10	MR. ROBB: Object to form.	9
11	A Correct.	10
12	Q You're not suggesting that Headwater	11
13	didn't develop real technology in its patents, are	12
14	you?	13
15	MR. ROBB: Object to form.	14
16	A No.	15
17	Q And you're proud of your patents,	16
18	correct?	17
19	A Absolutely.	18
20	Q And, by the way, the patents that list	19
21	you and Dr. Greg Raleigh, and possibly other	20
22	inventors, you all, as inventors, did not develop	21
23	that during your time at Qualcomm, correct?	22
24	MR. ROBB: Object to form and scope.	23
25	A Correct.	24
		25

	177	179
1 years, yeah.	2 Q And any other time periods, it's better 3 just to ask Dr. Raleigh; is that fair?	1 sure.
4 A Absolutely, yeah.	5 Q And even in that time period, you 6 weren't speaking on behalf of Dr. Raleigh; you 7 were just speaking on behalf of yourself, correct?	2 Q And do you think his inventions have 3 helped the world, his inventions over time?
8 A Correct.	9 Q You were also asked questions about 10 Headwater's motivations in 2009 and '10, and I 11 just had some of the same questions.	4 MR. ROBB: Object to form.
12 You were just speaking on behalf of 13 yourself from 2009 to 2010, fair?	5 A I would hope so.	6 Q Do you think he's a smart guy?
14 MR. ROBB: Object to form.	7 MR. ROBB: Object to form.	8 A Yeah, I do.
15 A Correct.	9 Q You were also asked some questions 10 today about the application layer or the API layer 11 for the ItsOn development.	12 Do you recall that?
16 Q You were also asked a few questions 17 about prior art today. And similar to my 18 questions from a few minutes ago, you haven't 19 compared the construed claim language in any of 20 the claims in any of these patents to the prior 21 art, correct, in preparation for your testimony 22 today, correct?	13 MR. ROBB: Object to form.	14 A Yeah.
23 A No, not for testimony today.	15 Q And I think you testified, and correct 16 me if I'm wrong, that James Lavine was a better 17 person to ask about those questions, correct?	16 A Oh, yeah.
24 Q Now while you were working at Headwater 25 and/or ItsOn in 2009 to 2010, you weren't involved	17 Q And why is that?	19 A Well, he was very intuitive of the 20 software development and the structural libraries 21 and the way you, you know, call a module and hand 22 over parameters and middleware, the firmware, he 23 was very familiar with it. I think that knowledge 24 was very valuable to putting all this together so it
1 in every single ItsOn project or on every single 2 ItsOn email, correct?	178	180
3 A Absolutely correct.	1 becomes a synthesizable design.	
4 Q Would Dr. Raleigh be a better person to 5 ask about the -- perhaps, certain projects you 6 weren't involved in or meetings that you weren't 7 involved in?	2 The idea can be, in fact, implemented 3 in an efficient way. Like I just said, there's 4 only -- devices have limited resources. Not like 5 we can just keep writing code.	
8 MR. ROBB: Object to form.	6 Q Right.	
9 A My recommendation, Dr. Raleigh would be 10 the right person to talk to.	7 A You have to be cognizant to the overall 8 CPU, memory, power, and so forth.	
11 Q And we talked about this a little bit 12 in your past deposition, but I believe you 13 testified that Dr. Raleigh has a unique way of 14 solving problems in the various technical fields, 15 correct?	9 MR. MIRZAIE: Okay. Maybe we can go 10 off the record for five minutes. I want to 11 streamline the rest of my questions. I think I 12 only have a couple minutes.	
16 MR. ROBB: Object to form.	13 MR. WASLIF: Sure.	
17 A Correct. My view, yeah.	14 THE VIDEOGRAPHER: We are going off the 15 record at 18:36.	
18 Q Can you explain that a little bit more?	16 (Recess taken.)	
19 MR. ROBB: Object to form.	17 THE VIDEOGRAPHER: We are back on the 18 record at 18:43.	
20 A Well, he tends to have broad knowledge 21 and have a way of putting different ideas together 22 and to come with an impactful, I'll call it, 23 impactful and wide, broad patent ideas and 24 innovations. So, he has that tendency, yeah. I 25 mean, I definitely enjoyed working with him for	19 MR. MIRZAIE: Mr. Raissinia, I don't 20 have any further questions at this time.	
	21 THE WITNESS: All right. Thank you.	
	22 MR. WASLIF: Anybody else have any 23 other questions?	
	24 MR. ROBB: None from me.	
	25 MR. HESS: None from me.	